

QUIN DENVIR, Bar No. 49374
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Attorney for Defendant
Matthew McCall, Jr.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	
)	No. CR S-05-0190 GEB
Plaintiff,)	
)	
v.)	
)	
MATTHEW McCALL, Jr.,)	STIPULATION AND [PROPOSED]
)	ORDER
Defendant.)	
_____)	

Plaintiff United States of America, by its counsel, Assistant United States Attorney R. Steven Lapham, and defendant Matthew McCall, Jr., by his counsel, Federal Defender Quin Denvir, hereby stipulate and agree that the status conference currently calendared for September 9, 2005 should be vacated and that the following motion schedule should be adopted:

Defense motions due by September 23, 2005;

Government response due by October 14, 2005;

Defense reply due by October 21, 2005;

Non-evidentiary hearing on October 28, 2005 at 9:00 a.m.

The parties further stipulate and agree that time should be excluded

through September 23, 2005 under Local Rule T-4.

Respectfully submitted,

McGREGOR W. SCOTT
United States Attorney

DATED: September 7, 2005

/s/ Quin Denvir
Telephonically authorized to sign for
R. STEVEN LAPHAM
Assistant United States Attorney

DATED: September 7, 2005

/s/ Quin Denvir
QUIN DENVIR
Federal Defender

O R D E R

FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated: September 7, 2005

/s/ Garland E. Burrell, Jr.
GARLAND E. BURRELL, JR.
United States District Judge